

FILED

FEB 27 2015

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

STEPHEN C. WILLIAMS
U.S. MAGISTRATE JUDGE
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
MATTHEW S. LIEBHEIT)
)
)
Defendant.)

CASE NUMBER 15-mj-7029-SCW

FILED UNDER SEAL

CRIMINAL COMPLAINT

I, Matthew J. Federhofer, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

COUNT 1

BANK ENTRIES, REPORTS AND TRANSACTIONS

On or about November 7, 2014, in Madison County, Illinois within the Southern District of Illinois,

MATTHEW S. LIEBHEIT,

defendant herein, being an officer, director, agent, or employee of Liberty Bank, an insured bank by the Federal Deposit Insurance Corporation, with the intent to defraud Liberty Bank, knowingly made a false entry in the reports of Liberty Bank, in that defendant altered a withdrawal slip originally made for \$10,000 to reflect an amount of \$80,000. All in violation of Title 18 United States Code, Section 1005.

COUNT 2

**THEFT, EMBEZZLEMENT, OR MISAPPLICATION
BY A BANK OFFICER OR EMPLOYEE**

On or about December 12, 2014, in Madison County, Illinois, within the Southern District of Illinois,

MATTHEW LIEBHEIT,

defendant herein, being an officer, director, agent, or employee of Liberty Bank, an insured bank by the Federal Deposit Insurance Corporation, willfully misapplied over \$1,000 of the moneys, funds, or credits of Liberty Bank, in that the defendant created falsified deposit documentation regarding a customer account and deposited \$70,000 to said customer account. All in violation of Title 18 United States Code, Section 656.

COUNT 3

**THEFT, EMBEZZLEMENT, OR MISAPPLICATION
BY A BANK OFFICER OR EMPLOYEE**

On or about December 13, 2014, in Madison County, Illinois, within the Southern District of Illinois,

MATTHEW LIEBHEIT,

defendant herein, being an officer, director, agent, or employee of Liberty Bank, an insured bank by the Federal Deposit Insurance Corporation, willfully embezzled, abstracted, or purloined over \$1,000 of the moneys, funds, or credits of Liberty Bank, in that the defendant staged a robbery with the assistance of **INDIVIDUAL #1**, and provided **INDIVIDUAL #1** with over \$1,000. All in violation of Title 18 United States Code, Sections 656 and 2.

AFFIDAVIT

On Saturday morning, December 13, 2014 the Bethalto Police Department received a 911 call for a bank robbery at Liberty Bank located at 333 West Bethalto Ave. in Bethalto, Illinois, which is located within the Southern District of Illinois. Bethalto Police and FBI Special Agent Matt Federhofer responded to the scene.

Liberty Bank Manager Matthew Liebheit, claimed that when he arrived for work that morning as the Branch Manager, he was accosted at his car by a person (hereinafter FNU LNU) who was completely covered with clothing, hat and mask, and gloves, and therefore unidentifiable. He described FNU LNU's vehicle as a tan or beige station wagon or crossover style vehicle. FNU LNU displayed a hand gun and carried a handled bag. FNU LNU forced Liebheit to go into the bank and give FNU LNU all of the money out of two safes that were located in the vault. During the robbery FNU LNU threatened Liebheit's family. Liebheit stated that before leaving, FNU LNU bound Liebheit with duct tape and struck him on the head with the gun three times. It was subsequently determined that the total amount stolen was over \$1,000. There appeared to be no visible injuries to Liebheit's head.

During a canvass of the neighborhood by Bethalto Police a witness was located that advised she had seen a person wearing all dark clothing exit the rear of the bank, get into a white pickup truck and leave the bank parking lot. Surveillance footage from Liberty Bank's ATM was reviewed and showed a white truck leaving the bank parking lot. A still photo was taken of the truck and shown to Liebheit who was being interviewed by Bethalto Police Sgt. Cole McMichael and FBI Special Agent Federhofer at the Bethalto Police Department. Liebheit identified the truck as his own. Liebheit stated that he had driven his Toyota Prius to work that morning. Liebheit could provide no explanation as to why his own truck would be leaving the scene of the bank robbery immediately after the incident. Liebheit said that the night before the robbery he drove his truck toward the bank with the intent of dropping his residential trash at the bank, but that he had trouble with the truck. He parked it at a nearby Schnucks, leaving the keys in it. That Schnucks is not located on the direct route from Liebheit's residence to Liberty Bank.

Liebheit stated that he often leaves the key in the truck when he parks it. Liebheit denied being involved in the bank robbery. Bethalto police located Liebheit's white truck on the Schnucks parking lot in Bethalto, in the same location where Liebheit had left it the previous evening. Liebheit subsequently provided written consent to search the truck. It was processed by Illinois State Police Crime Scene Investigations and a band of \$10 bills was found in the bed of the truck. There were no markings indicating the owner of the money. Additionally, a large object was in the bed of the truck. Liebheit was re-interviewed and again denied involvement in the robbery.

On December 15, 2014, additional surveillance footage was obtained by Bethalto Police from a neighboring business. The videos showed that on the morning of the robbery a truck matching the description of Liebheit's white truck was following a Toyota Prius that matched the description of Liebheit's Prius. Additional surveillance footage was subsequently obtained by Bethalto Police from other businesses in Bethalto which showed the two vehicles in tandem driving toward Liberty Bank prior to the robbery, then entering the Liberty Bank parking lot together. In some of the video footage obtained, it is evident that a large object was in the bed of the white truck. Video footage also showed the white truck leaving the bank immediately after the robbery.

On December 18, 2014, Liebheit was interviewed again and was confronted with evidence against him. He denied any involvement in the robbery and requested an attorney. Liebheit left, and no further contact has been made with him by law enforcement.

On December 29, 2014, in an interview with the security manager of all Liberty Bank branches, the security manager stated that Liebheit violated policy by opening the bank alone. In addition, Liebheit did not activate the panic code when he deactivated the alarm during the purported robbery.

Numerous interviews were conducted with friends and associates of Liebheit. During these interviews Individual #1 was named as an associate of Liebheit's. Individual #1 was subsequently approached by Bethalto Police. Individual #1 obtained an attorney, and on January 27, 2015, met with the FBI and Bethalto Police to conduct a proffer interview. Individual #1 provided details of the planning and execution of the theft of a large amount of money from Liberty Bank in Bethalto, Illinois on December

13, 2014. Individual #1 advised that Liberty Bank Manager Matthew Liebheit orchestrated and participated in the theft, designed by Liebheit to look like a robbery. The interview was video and audio recorded. Individual #1 also turned over \$112,938 in cash that was taken from the bank. An additional \$3000 was recovered from Individual #1 on February 2, 2015.

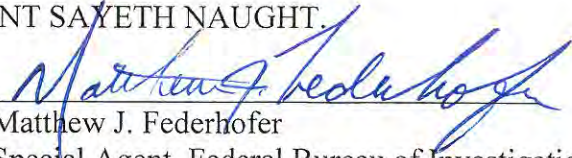
This investigation also revealed that on November 7, 2014, Liberty Bank Customer M.S. personally visited Liberty Bank, and withdrew \$10,000 from his Certificate of Deposit (CD) account. Matthew Liebheit subsequently changed the internal bank documents to reflect an \$80,000 withdrawal from M.S.'s CD, by changing the '1' to an '8.'

On December 12, 2014, the day before the purported robbery of Liberty Bank, Matthew Liebheit completed bank documents, specifically a "virtual ticket," indicating that M.S. made a \$70,000 deposit into his Money Market account. This transaction never occurred. The transaction came to M.S.'s attention and he contacted the bank.

Associates of Liebheit stated that Liebheit was involved in making bets locally and in Las Vegas. Subsequent investigation has revealed that Liebheit has a total installment and revolving debt of \$206,739.

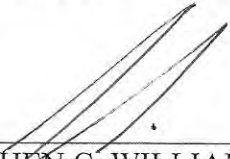
Liberty Bank is insured by the Federal Deposit Insurance Corporation.

FURTHER AFFIANT SAYETH NAUGHT.


Matthew J. Federhofer
Special Agent, Federal Bureau of Investigation

State of Illinois)
) SS.
County of St. Clair)

Sworn to before me and subscribed in my presence on the 27th day of February 2015, at
East St. Louis, Illinois.


STEPHEN C. WILLIAMS
United States Magistrate Judge

STEPHEN R. WIGGINTON
United States Attorney


LAURA REPERT
Assistant United States Attorney